

September 16, 2021

Document Electronically Filed

Hon. John G. Koeltl
United States District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Gonzalez v. Commissioner of Social Security
Civil Action No: 1:21-cv-02685-JGK

Dear Judge Koeltl:

This letter respectfully requests an extension of time of fifty-nine (59) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on September 21, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **November 19, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **January 18, 2022**. Plaintiff's Reply would then be due **February 8, 2022**.

Thank you for your consideration.

Respectfully submitted,

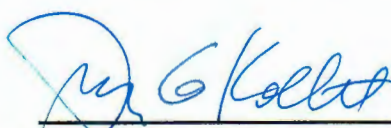
/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

CC [via ECF]: Amanda Frances Parsels (Counsel for Defendant)

SO ORDERED.

Dated: 9/16/21
New York, NY


Honorable John G. Koeltl
U.S. District Judge